

SCOTT J. SAGARIA (BAR # 217981)
SJSagaria@sagarialaw.com
ELLIOT W. GALE (BAR #263326)
Egale@sagarialaw.com
SAGARIA LAW, P.C.
333 West San Carlos Street, Suite 1750
San Jose, CA 95110
408-279-2288 ph
408-279-2299 fax

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CASE NO.: 4:12-cv-02452-CW

FIRST AMENDED COMPLAINT FOR
DAMAGES:

MARPU VENUGOPAL,

Plaintiff,

v.

CITIBANK, NATIONAL ASSOCIATION
an FDIC insured corporation and DOES 1
through 100 inclusive,

Defendants.

1. Violation of Fair Credit Reporting Act;
2. Violation of California Consumer Credit Reporting Agencies Act;
3. Violation of California Unfair Business Practices Act

COMES NOW Plaintiff MARPU VENUGOPAL, an individual, based on information and belief,
to allege as follows:

INTRODUCTION

1. This action seeks redress for the unlawful and deceptive practices committed by the Defendants in connection with their inaccurate reporting of Plaintiff's discharged debt. In particular, Defendant reported inaccurate overdue payments and an outstanding balance on Plaintiff's discharged credit account to Experian after discontinuing such reporting to Transunion and Equifax upon conclusion of its investigation. In addition, Defendant failed to report to Experian that the account information was in dispute. Plaintiff seeks monetary and declaratory relief based on violations of Fair Credit Reporting Act, 15 U.S.C. 1681s-2(b), California Consumer Credit Reporting Agencies Act, California Civil Code §1785.25(a), and California Business and Professions Code § 17200.

JURISDICTION AND VENUE

2. Plaintiff re-alleges and incorporates herein by this reference the allegations in each and every paragraph above, fully set forth herein.
3. Plaintiff, Marpu Venugopal (hereinafter "Plaintiff"), is an individual and currently resides in the county of Santa Clara, California.
4. This venue is proper pursuant to California Code of Civil Procedure § 395.5.
5. This Court has jurisdiction over Plaintiff's allegations pursuant to California Code of Civil Procedure § 410.10 et seq.
6. Plaintiff is a natural person and competent adult who at all relevant times in this Complaint resided in the State of California.
7. Defendant, Citibank, National Association (hereinafter "Creditor") is located at 701 East 60th Street North, Sioux Falls, South Dakota 57104. Creditor collects debts on its own behalf throughout the county of Santa Clara.
8. Plaintiff is unaware of the true names and capacities of Defendants DOES 1 through 100, inclusive. Plaintiff is informed and believes and thereon alleges that each fictitious Defendant was in some way responsible for the matters and things complained of herein, and in some fashion, has legal responsibility therefore. When the exact nature and identity of each fictitious Defendant's responsibility for the matters and things

1 herein alleged are ascertained by Plaintiff, Plaintiff will seek to amend this Complaint
2 and all proceedings to set forth the same, pursuant to California Code of Civil
3 Procedure § 474.

- 4 9. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned
5 herein, each of Defendant is, and at all relevant times herein was, the agent, employee,
6 and alter ego of each of the remaining Co-Defendants, and in committing the acts
7 herein alleged, was acting in the scope of their authority as such agents, employees, or
8 alter egos and with the permission and consent of the remaining Co-Defendants.

9 **PRE-LITIGATION CLAIM FILINGS**

- 10 10. On or about May 5, 2011 Plaintiff sent the three credit reporting agencies Experian,
11 Equifax, and Transunion ("CRA's") written notice disputing Creditor's inaccurate
12 reporting of overdue payments on an account included in Plaintiff's bankruptcy
13 petition. Pursuant to Section 1681i(a)(2) of the Fair Credit Reporting Act, all three
14 CRA's provided notice to Creditor of Plaintiff's dispute. After receiving notice of
15 Plaintiff's allegations, Creditor acknowledged the inaccuracy of the overdue payments
16 by discontinuing reporting any negative information to Transunion and Equifax.
17 Creditor, however, re-reported the overdue payments on Plaintiff's credit account to
18 Experian.

19 **GENERAL ALLEGATIONS**

- 20 11. Plaintiff re-alleges and incorporates herein by this reference the allegations in each and
21 every paragraph above, as though fully set forth herein.
- 22 12. On March 18, 2009 Plaintiff filed a voluntary Chapter 7 bankruptcy petition in the
23 United States Bankruptcy Court for the Northern District of California.
- 24 13. In the Schedules filed with the petition in this case and on the master mailing matrix
25 filed with the Clerk of this Court, a secured debt was listed on Schedule D in favor of
26 Creditor in the amount of \$197,466.00 (hereinafter "Debt").
- 27 14. On June 23, 2009 Plaintiff was granted a discharge of all dischargeable debts pursuant
28 to 11 U.S.C. § 727. Creditor was noticed by electronic transmission of Plaintiff's

1 discharge on June 24, 2009. Since Plaintiff never re-affirmed Creditor's debt during his
2 bankruptcy, Plaintiff alleges that this Discharge included this prepetition debt.

3 15. On or about May 2, 2011 Plaintiff pulled his Informative Research Credit Report, a
4 compilation of reporting information from Experian, Transunion, and Equifax to ensure
5 accurate reporting. The report indicates that Creditor reported an outstanding account
6 balance of \$197,466 and overdue payments to all three CRA's each month from the
7 time Plaintiff filed for bankruptcy up until entry of the discharge order. Plaintiff alleges
8 that the information furnished was inaccurate because it suggests that the account was
9 still collectable throughout Plaintiff's bankruptcy case and because the discharge order,
10 which removed Plaintiff's legal obligation to pay Creditor, relates back to the date
11 Plaintiff filed for bankruptcy.

12 16. On or about May 5, 2011 Plaintiff sent a letter to Experian, Equifax, and Transunion
13 requesting a formal, full, and complete investigation of the information Creditor
14 furnished on Plaintiff's credit account. Specifically, Plaintiff disputed the overdue
15 payments reported throughout the pendency of Plaintiff's bankruptcy petition and the
16 recent outstanding balance of \$197,466. Plaintiff alleges that the CRA's sent notice of
17 his dispute to Creditor.

18 17. On or about May 17, 2011 Plaintiff received updated Equifax and Transunion credit
19 reports in response to his dispute with the CRA's. Plaintiff alleges that the credit reports
20 indicate Creditor removed the overdue payments from the payment history section and
21 reported the account as discharged in bankruptcy with no amount past due. True and
22 correct copies are attached as Exhibits A.

23 18. On or about May 25, 2011 Plaintiff received an updated Experian credit report. The
24 credit reports indicate that Creditor re-reported the disputed overdue payments while
25 also reporting an outstanding balance of \$197,466 as of May 2011. A true and correct
26 copy is attached as Exhibit B.

27 19. On or about March 12, 2012 Plaintiff received his Service 1st credit report, a
28 compilation of credit reports from Experian, Equifax, and Transunion. The credit report
indicates that Creditor continued reporting the inaccurate information to Experian.

1 20. To date, Creditor refuses to correct Plaintiff's credit report despite being noticed of the
2 original bankruptcy and re-noticed of its inaccurate reporting from all three CRA's. A
3 true and correct copy is attached as Exhibit C.

4 21. The actions of Creditor as alleged herein are acts in violation of the Fair Credit
5 Reporting Act, 15 U.S.C. § 1681s-2(b).

6 22. The actions of Creditors as alleged herein are acts in violation of the consumer credit
7 reporting agencies act California Civil Code § 1785.25(a).

8 23. The actions of Creditors as alleged herein are acts in violation of the California
9 Business and Professions Code § 17200.

10 **FIRST CAUSE OF ACTION**
11 (Violation Of Fair Credit Reporting Act
12 15 U.S.C. § 1681s-2(b))
(Against Defendant Creditor and Does 1-100)

13 24. Plaintiff re-alleges and incorporates herein by this reference the allegations in each and
14 every paragraph above, as though fully set forth herein.

15 25. Creditor, in the course of regular business, reports information to credit reporting
16 agencies.

17 26. Plaintiff promptly disputed Creditor's inaccurate reporting with Experian, Equifax, and
18 Transunion. Plaintiff alleges that all three CRA's sent notice of Plaintiff's dispute to
19 Creditor pursuant to Section 1681i(a)(2) of the Fair Credit Reporting Act. Creditor was
20 thereafter under a duty to reasonably investigate Plaintiffs dispute pursuant to section
21 15 U.S.C. § 1681s-2(b).

22 27. Plaintiff alleges that Creditor's investigation of Plaintiff's dispute with Experian was
23 unreasonable. More specifically, Creditor should have discovered from its records,
24 including two notices sent from the bankruptcy noticing center and its investigation of
25 Plaintiff's dispute with Transunion and Equifax, that the information Creditor furnished
26 to Experian was inaccurate.

27 28. Plaintiff alleges that Creditor separately violated § 1681s-2(b) by failing to report to
28 Experian that the account information was in dispute.

29. Plaintiff alleges that the Transunion and Equifax credit reports indicate Creditor found the information to be inaccurate during its investigation. As a result, Creditor should have reported the result of its investigation to Experian and removed the inaccurate information pursuant to 15 U.S.C. § 1681s-2(b)(1)(D)-(E).

30. Creditor's failure to correct the previously disclosed inaccuracies on Plaintiff's credit report was intentional and in reckless disregard of its duty to refrain from reporting inaccurate information. Consequently, creditor willfully and negligently failed to comply with its duty to investigate Plaintiff's dispute under 15 U.S.C. 1681(n) & (o).

31. As a direct and proximate result of Creditor's willful and untrue communications, Plaintiff incurred out of expenses including but not limited to reviewing credit reports from all three consumer reporting agencies, traveling to and from Plaintiff's counsel's office, sending demand letters, and such further expenses in an amount to be determined at trial.

32. As a further direct and proximate result of Creditor acts state herein, Plaintiff received a denial of credit from other credit agencies, was impeded in seeking necessary products and services from vendors, and suffered humiliation, embarrassment, anxiety, and loss of sleep.

33. Wherefore, Plaintiff prays for judgment as hereinafter set forth.

SECOND CAUSE OF ACTION

(Violation Of Consumer Credit Reporting Agencies Act

California Civil Code § 1785.25(a))

(Against Defendants Creditor and Does 1-100)

34. Plaintiff re-alleges and incorporates herein by this reference the allegations in each and every paragraph above, as though fully set forth herein.

35. Creditor, in the ordinary course of business, regularly and on a routine basis furnishes information to one or more consumer credit reporting agencies.

36. Creditor intentionally and knowingly reported inaccurate and false information. Plaintiff alleges that Creditor re-reported overdue payments and an outstanding account

1 balance on Plaintiff's discharged credit account to Experian after discontinuing such
2 reporting to Transunion and Equifax.

3 37. Creditor had reason to know the information it re-reported to Experian was inaccurate
4 based on the disputes from all three CRA's and the results of its investigation into
5 Plaintiff's dispute with Transunion and Equifax.

6 38. Creditor failed to notify consumer reporting agencies that the information Defendant
7 provided such agencies, was inaccurate before the end of 30 business days, in violation
8 of California Civil Code § 1785.25(a).

9 39. Creditor failed to correct inaccurate information provided to the agencies as described
10 hereinabove in violation of California Civil Code § 1785.25(a).

11 40. Creditor's communications of false information, and repeated failures to investigate,
12 and correct their inaccurate information and erroneous reporting were done knowingly,
13 intentionally, and in reckless disregard for their duties and Plaintiff's rights.

14 41. As a direct and proximate result of Creditors willful and untrue communications,
15 Plaintiff has incurred out of pocket expenses including but not limited to reviewing
16 credit reports from all three consumer reporting agencies, traveling to and from
17 Plaintiff's counsel's office, sending demand letters, and such further expenses in an
18 amount to be determined at trial.

19 42. As a further direct and proximate result of Creditor acts state herein, Plaintiff received a
20 denial of credit from other credit agencies, was impeded in seeking necessary products
21 and services from vendors, and suffered humiliation, embarrassment, anxiety, and loss
22 of sleep.

23 43. Wherefore, Plaintiff prays for judgment as hereinafter set forth.
24
25
26
27
28

THIRD CAUSE OF ACTION

(Unfair Business Practices Act
California Business and Professions Code § 17200)
(Against Defendant Creditor and Does 1-100)

58. Plaintiff re-alleges and incorporates herein by this reference the allegations in each and every paragraph above, as though fully set forth herein.

59. Plaintiff brings this action in individual capacity and on behalf of the general public.

60. Creditor at all times relevant to this Complaint, was engaged in the business of collections and providing services on credit to qualified applicants.

61. Commencing on or about January 18, 2011 and continuing to the present, Creditor committed the acts of unlawful practices as defined by Business and Professions Code § 17200 and described in the above stated Causes of Action.

62. Creditor's acts and practices described above were unlawful under the California Civil Code § 1785.25(a) and therefore constitute unlawful practices within the meaning of Business and Professions Code § 17200.

63. These unlawful business practices of Creditor are likely to continue and therefore will continue to injure Plaintiff by inaccurate record keeping, failure to correct inaccuracies and erroneous dissemination of inaccurate information, and present a continuing threat to the public.

65. Wherefore, Plaintiff prays for judgment as hereinafter set forth.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- a. For preliminary and permanent injunctive relief to stop Defendants from engaging in the conduct described above;
- b. Award \$10,000 in statutory and actual damages pursuant to 15 U.S.C. § 1681n and California Civil Code § 1785.31;
- c. Award punitive damages in order to deter further unlawful conduct pursuant to 15 U.S.C. § 1681n; and California Civil Code § 1785.31
- d. Award \$2,500 in civil penalties pursuant to California Business & Professions

Code § 17206;

e. Award attorney's fees and costs of suit incurred herein pursuant to 15 U.S.C. § 1681n & o; California Civil Code § 1785.31;

f. For determination by the Court that Creditor's policies and practices are unlawful and in willful violation of 15 U.S.C. § 1681n, et seq.; and California Business and Professions Code § 17200, et seq.;

g. For determination by the Court that Creditor's policies and practices are unlawful and in negligent violation of 15 U.S.C. § 1681o

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial of this matter by jury.

SAGARIA LAW, P.C.

Dated: January 22, 2013

By: /s/ Elliot Gale

Scott Sagaria, Esq.
Elliot Gale, Esq.
Attorneys for Plaintiff

EXHIBIT A

P. O. Box 105518
Atlanta, GA 30348

003848



000974534-3848
Venugopal Marpu

EQUIFAX

CREDIT FILE : May 15, 2011
Confirmation # [REDACTED]

Dear Venugopal Marpu:

Your request for Equifax to reinvestigate certain items of your credit file is now complete.

Below are your results and a report of your credit file revised, as applicable, as a result of the reinvestigation. If you have additional questions regarding the reinvestigated items, please contact the source of that information directly. You may also contact Equifax regarding the specific information contained within this letter or report within the next 60 days by visiting us at www.investigate.equifax.com.

Thank you for giving Equifax the opportunity to serve you.

The Results Of Our Reinvestigation

Public Record Information (This section includes public record items obtained from local, state and federal courts.)

>>> We have reviewed the bankruptcy information. Case or ID # - 0951924 The results are: This bankruptcy is currently reporting as discharged. If you have additional questions about this item please contact **Northern District of CA, 208 S 1st St RM 3035, San Jose CA 95113-2701 Phone: (408) 535-5118**

Bankruptcy Filed 03/2009; California Federal Bankruptcy; Case or ID # - 0951924; Type - Personal; Filer - Individual; Current Disposition - Discharged CH-7; Current Disposition Date 06/23/2009; Date Reported 06/25/2009; Prior Disposition - Voluntary CH-7; Address: 280 S 1ST ST RM 3035 SAN JOSE, CA 95113-3010 : (408) 535-5118

Credit Account Information

(For your security, the last 4 digits of account number(s) have been replaced by *). (This section includes open and closed accounts reported by credit grantors.)

Account History Status Code Descriptions	1 : 30-59 Days Past Due 2 : 60-89 Days Past Due 3 : 90-119 Days Past Due 4 : 120-149 Days Past Due	5 : 150-179 Days Past Due 6 : 180 or More Days Past Due G : Collection Account H : Foreclosure	J : Voluntary Surrender K : Repossession L : Charge Off
--	---	---	---

>>> We have researched the credit account. Account # - 90005* The results are: Please be advised that this account is currently reporting as included in bankruptcy on your credit file. Please be advised that account included in bankruptcy do not report any balance. Please be advised that account included in bankruptcy do not report any late payments. If you have additional questions about this item please contact **Digital FCU, PO Box 9123, Marlborough MA 01752-9123**

Digital Federal Credit Union PO Box 9123 Marlborough MA 01752-9123

Account Number	Date Opened	High Credit	Credit Limit	Terms Duration	Terms Frequency	Months Rev'd	Activity Designator	Creditor Classification					
90005*	10/2005		\$0										
Items As of Date Reported	Balance Amount	Amount Past Due	Date of Last Payment	Actual Payment Amount	Scheduled Payment Amount	Date of 1st Delinquency	Date of Last Activity	Date Mat. Del. 1st Hold	Charge Off Amount	Deferred Pay Start Date	Balloon Pay Amount	Balloon Pay Date	Date Closed
03/2009				\$0	\$0	12/2008	03/2009	03/2009	\$0		\$0		

Status - Account Included In Bankruptcy; Type of Loan - Conventional Re Mortgage; Whose Account - Individual Account; ADDITIONAL INFORMATION - Bankruptcy Chapter 7; Bankruptcy Discharged;

(Continued On Next Page)

File Number:
Page:
Date Issued:

1 of 4
05/25/2011

TransUnion.

Special Notes: If any item on your credit report begins with 'MED1', it includes medical information and the data following 'MED1' is not displayed to anyone but you except where permitted by law.

Account Information

The key to the right helps explain the payment history information contained in some of the accounts below. Not all accounts will contain payment history information, but some creditors report how you make payments each month in relation to your agreement with them.

N/A	X	OK	30	60	90	120
Not Applicable	Unknown	Current	30 days late	60 days late	90 days late	120 days late

Adverse Accounts

The following accounts contain information which some creditors may consider to be adverse. Adverse account information may generally be reported for 7 years from the date of the first delinquency, depending on your state of residence. The adverse information in these accounts has been printed in brackets or is shaded for your convenience, to help you understand your report. They are not bracketed or shaded this way for creditors.

BANK OF AMERICA #431303699957****

PO BOX 17054
WILMINGTON, DE 19850-7054
(800) 421-2110

Balance: \$0
Date Verified: 03/2011
High Balance: \$25,339
Credit Limit: \$24,000

Pay Status: UNRATED
Account Type: REVOLVING ACCOUNT
Responsibility: INDIVIDUAL ACCOUNT
Date Open: 04/2008
Date Closed: 03/2009
Date Paid: 01/2009

Loan Type: CREDIT CARD

Remarks: CHAPTER 7 BANKRUPTCY

Estimated date that this item will be removed: 02/2016

CHASE BANK USA NA #540168302588****

PO BOX 15298
WILMINGTON, DE 19850
(800) 955-9900

Balance: \$0
Date Verified: 03/2009
High Balance: \$20,996
Credit Limit: \$21,000

Pay Status: UNRATED
Account Type: REVOLVING ACCOUNT
Responsibility: INDIVIDUAL ACCOUNT
Date Open: 07/2003
Date Closed: 03/2009
Date Paid: 02/2009

Loan Type: CREDIT CARD

Remarks: CHAPTER 7 BANKRUPTCY

Estimated date that this item will be removed: 01/2016

CITIBANK CBSD NA #542418064688****

701 E 60TH ST N
SIOUX FALLS, SD 57104
Phone number not available

Balance: \$0
Date Verified: 05/2011
Credit Limit: \$7,710

Pay Status: UNRATED
Account Type: REVOLVING ACCOUNT
Responsibility: INDIVIDUAL ACCOUNT
Date Open: 09/2008
Date Closed: 03/2009
Date Paid: 12/2008

Loan Type: CREDIT CARD

Remarks: CHAPTER 7 BANKRUPTCY

Estimated date that this item will be removed: 01/2016

CITIBANK NA #922136****

1000 TECHNOLOGY DR
MS 504A
O'FALLON, MO 63368-2240
(800) 685-0935

Balance: \$0
Date Verified: 05/2011
High Balance: \$199,166
Credit Limit: \$200,000

Pay Status: UNRATED
Account Type: LINE OF CREDIT ACCOUNT
Responsibility: INDIVIDUAL ACCOUNT
Date Open: 11/2005
Date Closed: 08/2009

Loan Type: HOME EQUITY LOAN

Remarks: CHAPTER 7 BANKRUPTCY

Estimated date that this item will be removed: 02/2016

DEPARTMENT STORES NATION #430851443780****

PO BOX 8218
MASON, OH 45040
(800) 243-6552

Balance: \$0
Date Verified: 05/2011
High Balance: \$1,197
Credit Limit: \$300

Pay Status: UNRATED
Account Type: REVOLVING ACCOUNT
Responsibility: INDIVIDUAL ACCOUNT
Date Open: 12/2006
Date Closed: 03/2010
Date Paid: 06/2007

Loan Type: CREDIT CARD

Remarks: CHAPTER 7 BANKRUPTCY

Estimated date that this item will be removed: 05/2014

EXHIBIT B

Page 5 of 26

Credit items

BANK OF AMERICA
PO BOX 17054
WILMINGTON DE 19850
Phone number
(800) 421-2110
Partial account number
431303693957....
Address identification number
0192502698

Date opened	Type	Credit limit or original amount	Recent balance
Apr 2008	Credit card		\$0 as of Mar 2011
First reported	Terms	\$23,800	
Apr 2008	Not reported	High balance	
Date of status	Monthly	\$25,339	
Jun 2009	payment		
	Not reported		

Responsibility
Individual
Status
Discharged through Bankruptcy Chapter 7.
This account is scheduled to continue on record until Apr
2016.
This item was verified and updated on May 2011.
Account History
Debt included in Chapter 7 Bankruptcy on June 23, 2009

2009 2008
MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR

A/c account history - If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. This section also includes the scheduled payment amounts, amounts actually paid and the dates those payments were made. ND: No Data.

May09 May09

AB	0	0
DBR	Jan22	ND
SPA	ND	ND
AAP	ND	ND

AB = Account balance (\$)

DRR = Date payment received

SPA = Scheduled payment amount (\$)

AdP = Actual amount paid (\$)

Between May 2009 and May 2009, your credit limit/high balance was \$23,800

PO BOX 769005
SAN ANTONIO TX 78245
Phone number
(800) 685-0935
Partial account number
922136.....
Address identification number
0595821945

Date opened	Type	Credit limit or original amount	Recent balance
Nov 2005	Revolving	\$200,000	\$0 as of Apr 2011
First reported	Terms	\$200,000	
Nov 2005	Not reported	High balance	
Date of status	Monthly	\$200,000	
Jun 2009	payment		
	Not reported		

Individual Responsibility

Discharged through Bankruptcy Chapter 7.
This account is scheduled to continue on record until Mar 2016.
This item was verified and updated on May 2011.
Account History
Debt included in Chapter 7 Bankruptcy on June 23, 2009

Payment history

2009	2003	2007	2006	2005
MAY				
APR				
MAR				
FEB				
JAN				
DEC				
NOV				
OCT				
SEP				
AUG				
JUL				
JUN				
MAY				
APR				
MAR				
FEB				
JAN				
DEC				
NOV				
OCT				
SEP				
AUG				
JUL				
JUN				
MAY				
APR				
MAR				
FEB				
JAN				
DEC				
NOV				
OCT				
SEP				
AUG				
JUL				
JUN				
MAY				
APR				
MAR				
FEB				
JAN				
DEC				



Prepared for: VENUGOPAL MARPU
Date: May 17, 2011
Report number: 1639 546 239

Page 6 of 26

Your accounts that may be considered negative (continued)

Account history - If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. This section also includes the scheduled payment amounts, amounts actually paid and the dates those payments were made. ND: No Data.

Account	Mar11	Feb11	Jan11	Dec10	Nov10	Oct10	Sep10	Aug10	Jul10	Jun10	May10	Apr10	Mar10	Feb10	Jan10	Dec09	Nov09	Oct09	Sep09	Aug09	Jul09	Jun09	May09
AB	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466	197,466
DBR	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SP4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SP3	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Between May 2009 and Mar 2011, your credit limit/high balance was \$200,000

CHASE BANK USA
PO BOX 15298
WILMINGTON DE 19850
Phone number (800) 955-9900
Partial account number 540168302588....
Address identification number 0595821945

Date opened Jul 2003
Type Credit card
Credit limit or original amount \$21,000
Recent balance \$0 as of May 2011
First reported Aug 2003
Not reported
Date of status Jun 2009
Monthly payment
Not reported

Responsibility Individual
Status Discharged through Bankruptcy Chapter 7.
Creditor's statement "Account closed at credit grantor's request."
This item was verified and updated on May 2011.
Account History
Debt included in Chapter 7 Bankruptcy on June 23, 2009.

Payment history

2009	2008	2007	2006	2005
MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG	MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG	MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG	MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG	MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG

CITI CARDS/CITIBANK
PO BOX 6500
SIOUX FALLS SD 57117
Phone number (800) 843-0777
Partial account number 542418064688....
Address identification number 0299313157

Date opened Sep 2008
Type Credit card
Credit limit or original amount \$7,710
Recent balance \$0 as of May 2011
First reported Sep 2008
Not reported
Date of status Jun 2009
Monthly payment
Not reported

Responsibility Individual
Status Discharged through Bankruptcy Chapter 7.
Comment FCBA dispute resolved - consumer disagrees.
Creditor's statement "Account closed at credit grantor's request."
This item was verified and updated on May 2011.
Account History
Debt included in Chapter 7 Bankruptcy on June 23, 2009.

Payment history

2009	2008	2007	2006	2005
APR MAR FEB JAN DEC NOV OCT SEP	APR MAR FEB JAN DEC NOV OCT SEP	APR MAR FEB JAN DEC NOV OCT SEP	APR MAR FEB JAN DEC NOV OCT SEP	APR MAR FEB JAN DEC NOV OCT SEP

0484035251

EXHIBIT C

